

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT MORGALO,

Plaintiff,

v.

RUBEN BLADES and RUBEN
BLADES PRODUCTIONS, INC.,

Defendants.

Case No. 08 Civ. 4079 (LTS)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

NOW COME defendants, Ruben Blades and Ruben Blades Productions, Inc. ("Defendants"), through their undersigned counsel, and very respectfully state and pray:

1. The law firm of Cohen, Weiss and Simon LLP represents Defendants in the above captioned case, through the undersigned attorney.

2. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Jani K. Rachelson, a member in good standing of the bar of this Court, hereby move for an order allowing the admission *pro hac vice* of:

Eduardo J. Corretjer-Reyes
Bufete Roberto Corretjer Piquer
625 Ponce de Leon Avenue
San Juan, Puerto Rico 00917-4819
Tel. 787-751-4618
Fax 787-759-6503

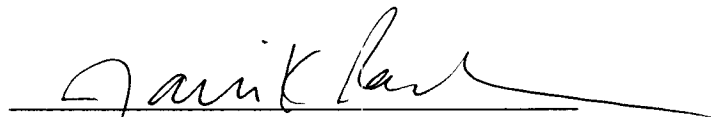
3. Eduardo J. Corretjer-Reyes is a member in good standing of the Bars of the District of Columbia, the State of New York, and the Commonwealth of Puerto Rico.

4. There are no disciplinary proceedings pending against Eduardo J. Corretjer Reyes in any State or Federal court.

New York, New York

RESPECTFULLY SUBMITTED

July 14, 2008.

A handwritten signature in black ink, appearing to read 'Jani K. Rachelson', is written over a horizontal line.

Jani K. Rachelson (JR0121)
Cohen, Weiss and Simon LLP
330 West 42nd Street, 25th Floor
New York, New York 10036-6976
Tel. 212-356-0221
Fax 646-473-8221

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT MORGALO

Plaintiff

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Defendants

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Case No. 08 Civ. 4079 (LTS)

**AFFIDAVIT OF
JANI K. RACHELSON
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
) ss:
County of New York)

I, Jani K. Rachelson, being duly sworn, hereby depose and say as follows:

1. I am a partner at Cohen, Weiss and Simon LLP, counsel for defendants, Ruben Blades and Ruben Blades Productions, Inc. ("Defendants"), in the above captioned case. I am familiar with the proceedings in this action. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Eduardo J. Corretjer-Reyes as counsel *pro hac vice* to represent in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1979. I am also admitted to the Bar of the United States District Court for the Southern District of New York and am in good standing with this Court.

3. I have known Eduardo J. Corretjer-Reyes since 2006.

4. Eduardo J. Corretjer-Reyes is counsel at Bufete Roberto Corretjer Piquer in San Juan, Puerto Rico.

5. I have found Mr. Corretjer-Reyes to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Mr. Corretjer-Reyes is a member of the Bar of the Commonwealth of Puerto Rico, State of New York and the District of Columbia. Certificates of Good Standing are attached hereto as Exhibit A.

7. Accordingly, I am pleased to move the admission of Eduardo J. Corretjer-Reyes, *pro hac vice*.


8. A proposed order for the admission of Eduardo J. Corretjer-Reyes, *pro hac vice*, is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Eduardo J. Corretjer-Reyes, *pro hac vice*, as counsel for Defendants in the above-captioned proceedings be granted.

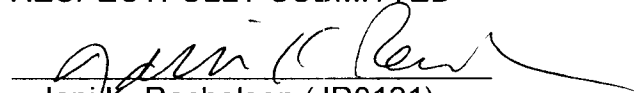
Dated: July 14, 2008

City, State: NEW YORK, NY

Notarized:

7.14.08 
MARIOLA MOSCOSO
Notary Public, State of New York
No. 01MO6080059
Qualified in Queens County
Commission Expires Sept. 3, 2010

RESPECTFULLY SUBMITTED


Jani K. Rachelson (JR0121)
Cohen, Weiss and Simon LLP
330 West 42nd Street, 25th Floor
New York, New York 10036-6976
Tel. 212-356-0221
Fax 646-473-8221

*Commonwealth of Puerto Rico
Supreme Court
San Juan, Puerto Rico*

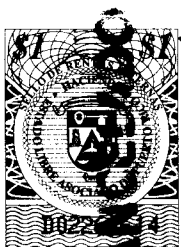
Certificate

This is to certify that on 29th day of August, 2006

Eduardo José Corretjer-Reyes

was admitted by this Supreme Court to practice as an attorney at law on all the courts of the Commonwealth of Puerto Rico, after taking and passing the written bar examination and taking and subscribing the oath required by law. I further certify that Mr. Corretjer-Reyes is in Good Standing on the Roll of Attorneys of this Court.

In Witness Whereof, Issue this certificate, on which I have cancelled an internal revenue stamp of one dollar, in the City of San Juan, Puerto Rico, this 9th day of July, 2008.



*2008
9/14/08*

José Luis Suárez

Assistant Clerk

Supreme Court of Puerto Rico

2008 6/14



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

EDUARDO J. CORRETJER-REYES

was on the 6TH day of JULY, 2007

duly qualified and admitted as an attorney and counselor. This attorney is, on the date indicated below, voluntarily registered as an inactive member in good standing of the District of Columbia Bar and, therefore, is not currently eligible to practice law in the District of Columbia.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 25, 2008.

GARLAND PINKSTON, JR., CLERK

By: *A Charles*
Deputy Clerk



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

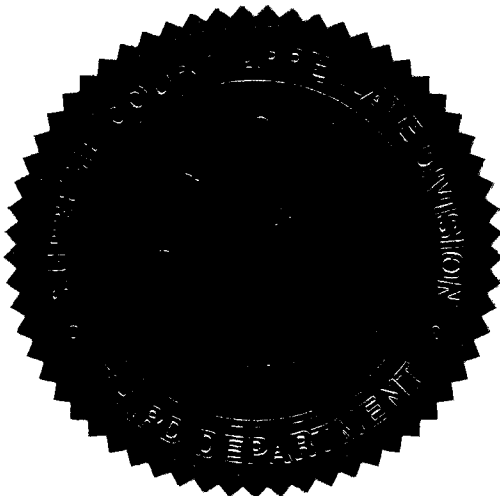
Eduardo J. Corretjer-Reyes

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 20th day of September, 2006, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 26th day of June, 2008.

Michael J. Novack

Clerk



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT MORGALO

Plaintiff

v.

RUBEN BLADES and RUBEN
BLADES PRODUCTIONS, INC.

Defendants

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* Case No. 08 Civ. 4079 (LTS)

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**ORDER ON WRITTEN MOTION FOR ADMISSION PRO HAC VICE OF EDUARDO J.
CORRETJER-REYES**

Upon the motion of Jani K. Rachelson, counsel for defendants, Ruben Blades and Ruben Blades Productions, Inc., and said sponsor's affidavit in support;

It is hereby Ordered that

Eduardo J. Corretjer-Reyes
Bufete Roberto Corretjer Piquer
625 Ponce de Leon Avenue
San Juan, Puerto Rico 00917-4819
Tel. 787-751-4618
Fax 787-759-6503
ejcr98@yahoo.com

is admitted to practice *pro hac vice* as counsel for defendants, Ruben Blades and Ruben Blades Productions, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

**Dated:
New York, New York**

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT MORGALO, *

Plaintiff, * Case No. 08 Civ. 4079 (LTS)

v. *

RUBEN BLADES and RUBEN *
BLADES PRODUCTIONS, INC., *

Defendants. *

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Dolores Aquilina, being duly sworn, deposes and says that on July 14, 2008, deponent caused true and correct copies of the foregoing Motion to Admit Counsel Proc Hac Vice, and the Affidavit of Jani K. Rachelson In Support of Motion to Admit Counsel Pro Hac Vice to be sent by United States First Class Mail, postage prepaid and addressed as follows:

Attorney for Plaintiff Robert Morgalo

Michael B. Tolcott, Esq.
Gilbert B. Abramson & Associates
The Widener Building
1339 Chestnut Street
Philadelphia, PA 19107

Dated: July 14, 2008
New York, New York



Sworn to me this 14th Day of July, 2008


Notary Public

MARIOLA MOSCOSO
Notary Public, State of New York
No. 01MO6080050
Qualified in Queens County
Commission Expires Sept. 3, 2010